

# **EXHIBIT 8**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

5 WAYMO LLC, )  
6 Plaintiff, )  
7 vs. ) Case No.:  
8 UBER TECHNOLOGIES, INC., ) 3 :17 -cv -00939 -WHA  
9 OTTOMOTTO LLC; OTTO TRUCKING )  
LLC, )  
10 Defendants. )  
-----)

ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF JAMES HASLIM  
San Francisco, California  
Tuesday, April 18, 2017  
Volume 1

23      Reported by:  
          RACHEL FERRIER, CSR No. 6948  
24      Job No. 2597892  
25      PAGES 1 - 112

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VIDEOTAPED DEPOSITION OF JAMES HASLIM,  
VOLUME 1, taken on behalf of the Plaintiff, at Quinn  
Emanuel Urquhart & Sullivan, LLP, 50 California Street,  
22nd Floor, San Francisco, California, beginning at  
9:13 a.m. and ending at 11:49 a.m. on Tuesday,  
April 18, 2017, before RACHEL FERRIER, Certified  
Shorthand Reporter No. 6948.

1	company.	09:25:42
2	Q Okay. What is your understanding of	09:25:42
3	Mr. Levandowski's involvement in Oden Wave, slash, Tyto	09:25:46
4	LiDAR?	09:25:50
5	A I don't know of any involvement of Anthony	09:25:50
6	Levandowski and Tyto LiDAR or Oden Wave.	09:25:56
7	Q Did you ever see Mr. Levandowski at Tyto LiDAR,	09:26:01
8	slash, Oden Wave's offices?	09:26:05
9	A Yes. While we were at the Dwight Way address in	09:26:07
10	Berkeley, I did see Anthony Levandowski at that	09:26:10
11	location.	09:26:14
12	Q And the Dwight Way address -- Mr. Levandowski	09:26:14
13	owns that building; right?	09:26:15
14	A I don't know.	09:26:17
15	Q Okay. So you are not aware that Mr. Levandowski	09:26:17
16	owns that -- the building at Dwight Way; is that right?	09:26:19
17	A I don't have firsthand knowledge of that, no.	09:26:22
18	Q Do you have any knowledge of that?	09:26:25
19	A Rumor, speculation. I believe I had heard that	09:26:26
20	he was the owner of the building.	09:26:30
21	Q Did that surprise you?	09:26:31
22	A No.	09:26:34
23	Q When did you learn that?	09:26:35
24	A I think it would have been after I was working	09:26:36
25	there sometime.	09:26:41

1	Q When did you first see Mr. Levandowski at	09:26:42
2	Oden Wave, slash, Tyto LiDAR's offices?	09:26:47
3	A I don't recall.	09:26:51
4	Q How often did he show up?	09:26:53
5	A There was no regular rou- -- routine or	09:26:54
6	repetition to it. It was sporadic on and off.	09:27:02
7	Q Once a week?	09:27:06
8	A Don't recall it being necessarily once a week. I	09:27:07
9	don't know.	09:27:14
10	Q Twice a week?	09:27:14
11	A You know, I don't think it was that often.	09:27:15
12	Q Every other week?	09:27:19
13	A You can -- you're trying to get me to narrow down	09:27:20
14	exactly what the -- the rate was, but, again, I'm trying	09:27:25
15	to say there was no -- I don't recall any specific	09:27:27
16	cadence or -- or repetition rate to it.	09:27:29
17	Q So I understand you are saying you don't recall	09:27:32
18	exactly how often he showed up.	09:27:35
19	A Yes.	09:27:37
20	Q What I'm trying to understand is the bounds of	09:27:37
21	your memory here.	09:27:40
22	So is it fair to say that you wouldn't dispute	09:27:42
23	that he showed up once every other week?	09:27:46
24	A No. If somebody suggested that was the case, I	09:27:49
25	would not contest that.	09:27:51

1	Q Okay. When Mr. Levandowski showed up at Tyto	09:27:52
2	LiDAR, why was he there?	09:28:04
3	A I believe he had an office in the building.	09:28:05
4	Q And what was he doing?	09:28:11
5	A I don't know.	09:28:13
6	Q Did you ever talk with him?	09:28:14
7	A Occasionally.	09:28:15
8	Q About what?	09:28:16
9	A He would ask questions about the business, how we	09:28:17
10	were doing; chat, as a friend.	09:28:21
11	Q It was not formally related to the business?	09:28:24
12	A Which business?	09:28:27
13	Q Tyto LiDAR.	09:28:28
14	A Not to my knowledge.	09:28:30
15	Q Are you familiar with a company called Dogwood	09:28:31
16	Leasing?	09:28:34
17	A I have heard the name Dogwood Leasing.	09:28:34
18	Q What's your understanding of that company?	09:28:37
19	A My understanding was we were using some	09:28:38
20	consultants that were hired by Dogwood Leasing for labor	09:28:42
21	in Oden Wave/Tyto LiDAR.	09:28:47
22	Q Who decided to hire consultants from this Dogwood	09:28:48
23	Leasing company?	09:28:52
24	A I don't know.	09:28:52
25	Q Was it you?	09:28:55

1	A No.	09:28:55
2	Q Are you aware that Mr. Levandowski owns that	09:28:56
3	company?	09:29:01
4	A I don't have firsthand knowledge, but I have	09:29:01
5	heard that to be the case.	09:29:05
6	Q Why was Tyto LiDAR hiring consultants from a	09:29:07
7	company owned by Mr. Levandowski?	09:29:13
8	A I don't know why Tyto LiDAR or Oden Wave hired	09:29:16
9	specific- -- specifically from that company.	09:29:20
10	Q Who -- who would have decided that?	09:29:23
11	A I believe that would have been a decision made by	09:29:24
12	Brent Schwartz.	09:29:28
13	Q Anyone else?	09:29:28
14	A Not necessarily.	09:29:29
15	Q What do you mean "not necessarily"?	09:29:31
16	A I'm not aware of anyone else's input. We -- we	09:29:33
17	had another employee of the company for legal purposes.	09:29:37
18	I don't know if they conferred. It's entirely possible.	09:29:41
19	Q Who's the other employee you are referring to?	09:29:44
20	A Ognen.	09:29:45
21	Q And that's --	09:29:48
22	A I can't pronounce his last name. Sorry.	09:29:50
23	Q His last name?	09:29:53
24	A "Sterginoff" [phonetic] or "Sterginoff."	09:29:54
25	Q He actually headed Tyto LiDAR for a time; right?	09:29:56

1	A	I'm not aware of that.	09:30:02
2	Q	You are not aware of that?	09:30:03
3	A	No. No.	09:30:04
4	Q	Okay. Are you aware of the relationship with	09:30:05
5		Mr. -- I think it's Stepnowski [phonetic], or something	09:30:10
6		along those lines, Ognen --	09:30:12
7	A	Okay. Ognen.	09:30:12
8	Q	-- and Mr. Levan- -- Mr. Levandowski?	09:30:18
9	A	I think I had only heard that they may have known	09:30:22
10		each other from Cal.	09:30:25
11	Q	Are you aware of an incident in 2013 where Tyto	09:30:30
12		LiDAR was ordering an identical part to one that Google	09:30:35
13		was making at the time?	09:30:39
14	A	No.	09:30:39
15	Q	Okay. You are not familiar with that incident?	09:30:41
16	A	I'm not familiar with Oden Wave making a part	09:30:45
17		identical to a part made by somebody else.	09:30:48
18	Q	Would that surprise you?	09:30:51
19	A	Yes.	09:30:52
20	Q	Why?	09:30:53
21	A	How would the parts be identical?	09:30:54
22	Q	I -- I don't know.	09:30:59
23	A	That would be a reason to surprise if they were	09:31:00
24		actually truly identical.	09:31:03
25	Q	Would it be really suspicious if they were	09:31:05

1	identical?	09:31:08
2	A It depends on the part, the nature of the part.	09:31:08
3	If the part was designed by requirements, if it was a	09:31:11
4	simple part, maybe it would not be so surprising.	09:31:14
5	Q Could be, though?	09:31:16
6	A Perhaps.	09:31:17
7	Q Okay. Who hired you at Tyto LiDAR?	09:31:18
8	A I'm not sure. I believe it would be Brent	09:31:29
9	Schwartz.	09:31:31
10	Q You are not sure who hired you?	09:31:32
11	A No.	09:31:35
12	Q How did you come to get the job?	09:31:37
13	A I spoke with a handful of people, but just in my	09:31:39
14	job today, I can't say -- it's hard for me to articulate	09:31:44
15	who hires people at our company. I would say Brent	09:31:48
16	Schwartz would be the hiring manager. In that case, I	09:31:51
17	could say it was Brent Schwartz.	09:31:54
18	Q So you said you spoke with a handful of people.	09:31:55
19	Who did you speak with?	09:31:58
20	A So I spoke with Brent Schwartz. I spoke with	09:31:59
21	Ognen -- no. What is his name. Soren Juelsgaard, and	09:32:04
22	I -- I did also, around the same time, speak with	09:32:12
23	Anthony Levandowski.	09:32:15
24	Q So when you were looking to get hired by Tyto	09:32:15
25	LiDAR, you spoke with Brent Schwartz, Anthony	09:32:22

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney or any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: April 18, 2017



RACHEL FERRIER

CSR No. 6948